

HOW TO PREPARE FOR A MONITORING SITE VISIT

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Learning Objectives

- ▶ Applicable federal and state requirements;
- ▶ How to conduct annual site visits;
- ▶ Ensuring that subrecipients meet the single Audit requirements (A-133); and
- ▶ Issuing management decisions about relevant subrecipient audit findings.

DEFINITION OF TERMS

CONTRACTOR VS. SUB-AWARD

45 CFR 75.351 A non-Federal entity may concurrently receive a Federal awards as a recipient, a sub-recipient and a contractor

Contractor (definition)

- ▶ *Contract* means a legal instrument by which a non-Federal entity purchases property or services needed to carry out the project or program under a Federal award. The term as used in this part does not include a legal instrument, even if the non-Federal entity considers it a contract, when the substance of the transaction meets the definition of a Federal award or sub-award (see *Sub-award*).

Sub-award (definition)

- ▶ *Sub-award* means an award provided by a pass-through entity to a sub-recipient for the sub-recipient to carry out part of a Federal award received by the pass-through entity. It does not include payments to a contractor or payments to an individual that is a beneficiary of a Federal program. A sub-award may be provided through any form of legal agreement, including an agreement that the pass-through entity considers a contract.

RECIPIENT VS. SUB-RECIPIENT

(45 CFR 75.351)

Recipient

- ▶ The entity that receives the RWHAP award directly from HRSA
- ▶ Many RWHAP recipients (recipient or sub-recipients) are also “pass-through” entities
- ▶ Pass-through entity is an entity that provides a sub-award to a sub-recipient to carry out part of the RWHAP activity

Subrecipient

- ▶ The entity that receives a sub-award from a pass-through entity to carry out part of the RWHAP programmatic activity (e.g., RWHAP provider)
- ▶ Is responsible for adherence to applicable Federal RWHAP program requirements
- ▶ Has its performance measured in relation to whether objectives of the RWHAP were met
- ▶ Uses Federal funds to carry out the RWHAP program for a public purpose as specified in authorizing statute

WHAT MONITORING IS

- ▶ **Test of compliance** with federal and program regulation and expectations
- ▶ **Technical assistance**
- ▶ **Prevents** sub-recipient non compliance issues that might result in future disallowment by auditors
- ▶ Performed during the grant year to allow for corrective measures
- ▶ An opportunity for improvement

RISK ASSESSMENT

45 CFR 75 Subpart C

Risk assessment prior to award

- Financial stability
- Single Audit
- Assessment of Key management positions
- Capacity to meet award requirements

Risk Management Defined

- *The practice of identifying potential risk in advance*
- *Analyzing them*
- *Taking precautionary steps to reduce/curb the risk*

RISK ASSESSMENT

- ▶ *(45 CFR 75.205) suggests an annual risk assessment for each program for which the recipient (VDH) provides funding.*
- ▶ Some factors affecting a Risk Assessment:
 - Financial stability;
 - Quality of management systems and ability to meet the management standards prescribed in the legislation;
 - History of performance;
 - Reports and findings from single audits performed;
 - The applicant's ability to effectively implement statutory, regulatory, or other requirements imposed on non- Federal entities.

INDIRECT COSTS

- ▶ Federal approved indirect cost rate
- ▶ **IDC requested and negotiated with the VDH Ryan White Office for analysis and negotiation.**
- ▶ Per 45 CFR 75.414(f), any non-Federal entity that has never received a Federal negotiated indirect cost rate may charge a de minimis rate of 10% of modified total direct costs.

QUESTIONS

PROCESS

▶ *Pre-Site Visit*

- ❖ Notification of site visit:
- ❖ Tools / Documents:
- ❖ Conference Call:

▶ *Post-Site Visit*

- ❖ Report to be received within 30 days of visit
- ❖ Corrective action plan to be completed 30 days after receipt of report

PREPARATION

- ▶ Review policies and procedures (i.e., service standards)
- ▶ Prepare brief presentation for entrance conference
- ▶ Inform staff to be interviewed of the process

QUESTIONS

MONITORING

45 CFR 75.342 (a)

- ▶ ***Monitoring by the non-Federal entity:***
 - The non-Federal entity is responsible for oversight of the operations of the Federal award supported activities.
 - The non-Federal entity must monitor its activities under Federal awards to assure compliance with applicable Federal requirements and performance expectations are being achieved.
 - Monitoring by the non-Federal entity must cover each program, function or activity. See also §75.352.

MONITORING EXPECTATIONS

GAO 2012 Report (page 2):

- ▶ Sub-recipients found to be in violation of program or federal grants management requirements are to receive technical assistance (TA) or other corrective actions designed to bring them into compliance.
- ▶ In this report, we evaluate:
 - How HRSA oversees CARE Act Recipients;
 - Steps HRSA has taken to assist CARE Act Recipients in monitoring their sub-recipients; and
 - How HHS oversees non-CARE Act Recipients

SOURCE DOCUMENTS FOR COMPLIANCE TESTING

- Title XXVI of the Public Health Service Act, 42 USC. Section 300ff-11s as amended by the Ryan White HIV/AIDS Treatment Extension Act of 2009 (P.L.111-87)
- The OMB Uniform Guidance 2 CFR 200/HHS Title 45 Subtitle A, Sub-chapter A, Part 75
- Department of Health and Human Services (HHS) Grants Policy Statement
- HRSA/HAB policy clarification notices, letters, and guidelines
- Office of Inspector General (OIG) reports and recommendations
- Manuals and Guidelines issued by HRSA/HAB including the National Monitoring Standards
- National HIV/AIDS Strategy

QUESTIONS

PROGRAM COMPLIANCE

- ▶ ***Access*** – Services accessible to low income individuals PHS Act 2602(b)(4); 2602(b)(4)(G); 2616 (c)(4); 2617(b)(7)(A)
- ▶ ***Allowable uses of funds – Amounts*** provided will be expended on core medical services, support services, and ***administration only***. (Legislation & PCN 16-02)
- ▶ ***Quality*** – Must have CQM Program
- ▶ ***Administration*** – Policies and procedures Confidentiality
- ▶ ***Eligibility*** – PHS ACT 2616 (b) (1-2); PHS ACT 2617 (b) (7) (B)

PROGRAM COMPLIANCE

► *Other Requirements:*

- ❖ *Referral Relationships* – Requirement that Part B sub-recipients maintain appropriate referral relationships with entities that constitute key points of entry into HIV care and services. Key points of entry defined in legislation: PHS ACT 2612 d (1); 2651 (e).
- ❖ *Prohibitions*
- ❖ *Anti-kickback* – Demonstrated structured and ongoing efforts to avoid fraud, waste and abuse (mismanagement) in any federally funded program
OIG Hotline
<https://forms.oig.hhs.gov/hotlineoperations/>
- ❖ *Personnel/Staffing* sub-recipients – 42 USC 1320 a 7b (b); PCN 16-02; VDH Service Standards---Governance/Management

ACCESS

- ▶ Consumer Input – Efforts to obtain input from clients in the design and delivery of services PHS Act 2616 (c)(4); PHS Act 2617(b)(7)(A). CAB, focus groups, satisfaction surveys
- ▶ Provision of services regardless of an individual's ability to pay for the service PHS Act 2617(b)(7)(B)(i).
- ▶ Provision of services regardless of the current or past health condition of the individual to be served 2617(b)(7)(B)(i).
- ▶ Facility – Provision of services in a setting accessible to individuals living with HIV disease who are low-income and that comply with the Americans with Disabilities Act (ADA) Barrier-Free Healthcare Initiative 42 USC 12101 Americans with Disabilities Act of 1990 PHS Act 2617(b) (7)(B)(ii) PHS Act 2616(c)(4).
- ▶ Outreach to inform low-income individuals of the availability of HIV-related services and how to access them PHS Act 2617 (b)(7)(B)(iii); PHS Act 2616(c)(5).

ALLOWABLE ACTIVITIES/COVERED SERVICES

- ▶ **Documents and questions to review**
 - ❖ Allowable uses core, support and administrative services only (PHS 2614)
 - ❖ Chart Review—notes reflect compliance 2614 and PCN
- ▶ **Interview**
 - ❖ Providers
- ▶ **Outcome client**
 - ❖ Payments reimbursed have been for allowable services under Ryan White Part B provided to eligible clients and approved for the project

ALLOWABLE SERVICES

- ▶ Outpatient and Ambulatory Health Services
- ▶ AIDS Drug Assistance Program Treatments
- ▶ AIDS Pharmaceutical Assistance
- ▶ Oral Health
- ▶ Early Intervention Services (EIS)
- ▶ Health Insurance Premium and Cost Sharing Assistance for Low-Income Individuals
- ▶ Home Health Care
- ▶ Home and Community-Based Health Services
- ▶ Hospice Services
- ▶ Medical Case Management, including Treatment Adherence Services
- ▶ Medical Nutrition Therapy
- ▶ Hospice
- ▶ Mental Health
- ▶ Substance Abuse Outpatient Care
- ▶ Child Care Services
- ▶ Emergency Financial Assistance
- ▶ Food Bank/Home Delivered Meals
- ▶ Health Education/Risk Reduction
- ▶ Housing
- ▶ Other Professional Services
- ▶ Linguistic
- ▶ Medical Transportation
- ▶ Non-medical Case Management
- ▶ Outreach Services
- ▶ Psychosocial Support Services
- ▶ Referral for Health Care and Support Services
- ▶ Rehabilitation Services
- ▶ Respite Care
- ▶ Substance Abuse Services (residential)

CORE

SUPPORT

CLINICAL QUALITY MANAGEMENT

Documentation: Quality Org Chart; clinical Quality Management Plan

Interview: Quality Supervisor; other staff

Outcome: the subrecipient has a clinical quality management program that has the following three components (PCN 15-02):

1. Infrastructure
2. Performance Measurement
3. Quality Improvement

ELIGIBILITY

- ▶ **Define Part B Ryan White legislation**
 - *HIV infected Persons*
 - *Low income individual as defined by the jurisdiction (RW Recipient)*
- ▶ **Monitoring Standards**
 - *Re-certification every six months*
 - *Documentation*
 - *Insurance verification*
 - *Residency*
- ▶ **Policy Notice 13-02**
 - *Documentation HIV status at initial visit*
 - *CD4/viral load at the discretion of grantee*
 - *P.O. boxes acceptable*
 - *A client self attestation can be used at 6-month recertification*
- ▶ **Policy Notice 13-03**
 - *To determine financial eligibility using Modified Adjusted Gross Income*
 - *Align client recertification with Marketplace eligibility*
 - *Recipients can request clients to provide Medicaid/or Marketplace eligibility determination*
 - *Exempt elderly, disabled, SSI, and medically needy*

ELIGIBLE RECIPIENTS

- ▶ **Documents**

- Review Charts
- All documents that verify eligibility criteria

- ▶ **Interview**

- Staff in charge taking first intake (case managers, eligibility workers or intake workers)

- ▶ **Desired Outcome**

- Ryan White Services are being offered to eligible clients which are HIV positive and meet poverty guidelines

RELATIONS REFERRAL

Documentation: Agreements with:

- ❖ Emergency rooms
- ❖ Substance abuse and mental health treatment programs
- ❖ Detoxification centers
- ❖ Detention facilities
- ❖ Clinics regarding sexually transmitted disease
- ❖ Homeless shelters
- ❖ HIV disease counseling and testing sites
- ❖ Public health departments
- ❖ Health care points of entry specified by eligible areas
- ❖ Federally Qualified Health Centers
- ❖ Entities such as Ryan White Part A,B, C, D, and F grant recipients

Interviews: Referral Clerk

Outcomes: Part B sub-recipients maintain appropriate referral relationships with entities that constitute key points of entry into HIV care and services. Key points of entry defined in legislation: PHS ACT 2612 d (1); 2651 (e).

GOVERNANCE/MANAGEMENT/ STAFFING

► Governance

- ❖ Must have formal organization that can receive federal funds 45 CFR
- ❖ Not-for profit (PCN 11-02)
- ❖ Governing board maintains appropriate authority to oversee the operations.

► Management

- ❖ Organize in a way that can carry out a portion of the federal award created Federal award assistance relationship and can safeguard assets (75.352).

► Staffing

- ❖ Agency maintains a management team as appropriate for the size and needs of the agency
- ❖ Service staff credentialed according to qualifications service standards.

QUESTIONS

FISCAL COMPLIANCE

- ▶ **Limitation on Uses of Part B Funding**--. Adherence to a 10 percent cap in the aggregate for administration (*2617 b (3) (B)*); 45CFR75.302, 352, 361, and Subpart E; HAB Policy Notice 15-01 and FAQ.
- ▶
- ▶ **Unallowable costs**— Review of sub-recipient budgets and expenditures to ensure there is no inclusion of any unallowable costs RW Part B 2612 (f); 2612 (f)); 2615 (b); *2684, DHHS Grants Policy Manual, The Part B Manual*.
- ▶
- ▶ **Incomes from fees for services performed**—Verify the provider/sub-recipient track and report funds collected from Part B provided services as program income and use it for core, support and administrative services (10% limitation does not apply). RW Part B 2617 (b) (C) (iii)); Clarification Notice 15-03; HHS Grants Policy Statement; 45 CFR 75.307. There is no program income if recipients pay sub-recipients on a unit cost basis.

FISCAL COMPLIANCE (CONTINUED...)

- ▶ **Imposition and Assessment of Client Charges**—Verify that the sub-recipient has implemented a policy for discounting charges (sliding fee scale) or applying a nominal fee on the uninsured based upon the Federal Poverty Level (FPL). There will be no charges or nominal fee for individuals with an income less than or equal to 100 percent of the official poverty line, (RW Part B 2617 (c) (1) (A)). For individuals with an income greater than 100 percent of the official poverty line, the sub-recipient will impose a charge or nominal fee on each such individual for the provision of such services under RW Part B 2617 (c)(3) and will impose the charge according to a schedule of charges that is made available to the public (RW Part B 2617 (c)(1)(B); 2617 c (2)(A). In addition, a policy must be implemented that limits the charges that can be imposed on a client in a given year for Ryan White services based on the client's income level in relation to the Federal Poverty Level (income less than or equal to 100% FPL, no charge, 101–200% FPL, 5%; 201–300% FPL, 7%; and above 300% of FPL, 10%) (RW Part B 2617 (c)(1)(C–E)).
- ▶ **Auditing Requirements**—Request and review the sub-recipient's Single Audit (previously known as an A-133 audit) required of sub-recipients receiving more than \$750,000 per year in Federal funds. (45 CFR 75, Sub Part F).
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FISCAL COMPLIANCE (CONTINUED...)

- ▶ **Financial Management**—Review the sub-recipient Financial Management System to verify compliance by sub-recipient with all regulations set forth in the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for HHS Awards (45 CFR 75). Requirements include: standards for Financial and Program Management; including standards for financial (grants) management systems; revision of budget and program plans; and property standards, including insurance coverage; equipment, supplies, and other expendable property. HAB Policy Clarification Notice 15-03 –HHS Grants Policy Statement–45 CFR 75.307.
- ▶
- ▶ **Property Standards**—Verify that tangible nonexpendable personal property with a useful life of more than 1 year and acquisition cost of \$5,000 or more per unit purchased directly with Ryan White Part B funds follows the Federal property standards (45 CFR 75.319).
- ▶
- ▶ **Cost Principles**—Review sub-recipient budgets and expenditure reports to determine whether the use of funds is consistent with Code of Federal Regulations (45 CFR 75, Sub Part E). If the recipient pays for services by unit, verify that the payment meets cost principles.
- ▶
- ▶ **Fiscal Procedures**—Fiscal policies, procedures, and systems to handle revenue and expenses according to Federal regulations as stated in Code of Federal Regulations, Ryan White legislation, HRSA/HAB policies notices, letters, guidance and manuals. **Salary Limitation**—Verify that the salary charged to a federal grant does not exceed Executive Level II. This limitation is the result of the 2014 Appropriations Act and applies to recipients as well as sub-recipients. The amount reflects an individual's base salary, exclusive of fringe benefits and income earned outside the applicant organization.
- ▶

ADMINISTRATIVE COST CAPS

- ▶ **Documents**
 - ❖ Expense and budget reports
- ▶ **Interviews**
 - ❖ Administrative positions charge Part B
- ▶ **Desired Outcomes**
 - ❖ Subrecipient administrative expenses meet legislative administrative definition

UNALLOWABLE COSTS

- ▶ Documents:
 - ❖ Budget; expenditures reports; invoices
- ▶ Interviews:
 - ❖ Accountant
- ▶ Outcomes:
 - ❖ Budgets and expenditures do not include any unallowable costs RW Part B 2612 (f); 2612 (f)); 2615 (b); *2684, DHHS Grants Policy Manual, The Part B Manual.*

PROGRAM PROHIBITIONS*

- ▶ Drug use and sexual activity
- ▶ Syringes
- ▶ Clothing
- ▶ Funeral, burial, cremation or related expenses
- ▶ Local or State personal property taxes (for residential property, private automobiles, or any other personal property)
- ▶ Household appliances
- ▶ Pet foods or other non-essential products
- ▶ Off-premise social/recreational activities or payments for a client's gym membership
- ▶ Purchase or improve land, or to purchase, construct, or permanently improve (other than minor remodeling) any building or other facility
- ▶ Pre-exposure prophylaxis and Non-Occupational Post-Exposure Prophylaxis
- ▶ International travel
- ▶ Employment and Employment Readiness
- ▶ Purchase Vehicles without Approval
- ▶ Purchase of land, construction, or renovations –2612(f)
- ▶ Cash payments to intended recipients of RWHAP services
- ▶ Funding liability risk pools 2615(b)
- ▶ Developing materials that may be perceived to promote or encourage injection drug use 2684

* Some legislative, most are Code of Federal Regulations

INCOME FROM FEES

(45 CFR §75.2)

Program Income:

- Program income means gross income earned by the non-Federal entity that is directly generated by a supported activity or earned as a result of the Federal award during the period of performance except as provided on 45 CFR §75.307(f).
- Program income includes but is not limited to income from fees for services performed, the use or rental of [sic.] real or personal property acquired under Federal awards, the sale of commodities or items fabricated under a Federal award, license fees and royalties on patents and copyrights, and principal and interest on loans made with Federal award funds.
- Interest earned on advances of Federal funds is not program income.

INCOME FROM FEES --

Third Party Reimbursement

▶ Documents & Questions to review

- ❖ Billing Collection Manual
- ❖ Review contracts insurance companies
- ❖ Charges, payments, adjustment reports
- ❖ G L revenue – program income

▶ Interviews

- ❖ Billing personnel, front desk

▶ Outcomes

- ❖ Policies and systems are in place to bill collect, report and expense program income
- ❖ Charges are current and adequate and clients are properly refer to eligibility determination
- ❖ Program income is tracked and used for core, support administration

IMPOSITION ASSESSMENT ON CHARGES

- ▶ **Documents & questions to review**
 - ❖ Sliding fee & cap on charges policy
- ▶ **Interviews**
 - ❖ Front desk, case managers and billing supervisors to assess implementation of policy
- ▶ **Outcomes**
 - ❖ **Uninsured clients receiving billable services** with an income less than or equal to 100 percent of the official poverty line, (RW Part B 2617 (c) (1) (A)) will not be charged and those above 100% will be charged and provided with a discount or nominal fee.
 - ❖ All clients are above 100% of poverty level have been assessed to receive free Ryan White services after they have met their annual limitation (cap) on charges.

IMPOSITION ASSESSMENT ON CHARGES

Sliding Fee Scale

Family Size	Annual Income	100% Poverty Level	150%	200%	250%
1	\$11,880	\$11,880	\$17,820	\$23,760	\$28,440
2	\$16,020	\$16,020			
3	\$20,160	\$20,160			
4	\$24,300	\$24,300			
5	\$28,440	\$28,440			
			\$10 or 33% of charges	\$15 or 66% of charges	\$20 or 100% of charges

IMPOSITION ASSESSMENT ON CHARGES

Limitation Charges–Cap on Charge

- ▶ Limitation on what a patient can be charged for his/her HIV care in a given year for the remainder of the year
- ▶ Caps on charges based on those with incomes above the federal poverty level
- ▶ Evaluation of charges imposed, not payments
- ▶ Consideration of account premiums, copayments, and co-insurance

IMPOSITION ASSESSMENT ON CHARGES

Cap on Charges

Family Income	Maximum Charge
<i>At or below FPL</i>	<i>No Limit \$0</i>
<i>101%–to 200% FPL</i>	<i>No more than 5% of gross annual income</i>
<i>201%–200% FPL</i>	<i>No more than 7% of gross annual Income</i>
<i>391% above</i>	<i>No more than 19% of gross annual income</i>

SINGLE AUDIT — (45 CFR 75 Subpart F)

Compliance

- Timely submission of Single audit (federal awards at or over \$750,000)
- Documentation that single audit commissioned by Board or auditor independent from agency fiscal staff
- If findings there is a corrective action plan
- Questioned federal cost have been returned

FINANCIAL MANAGEMENT—

Payer of Last Resort

- ▶ **Legislation:**

- ❖ *“...for any item or service to the extent that payment has been made, or can reasonably be expected to be made...” by another payment source*

- ▶ **Documentation:**

- ❖ Chart review notes, insurance certification policy, service standards

- ▶ **Interviews:**

- ❖ Front desk, benefit counselor

- ▶ **Outcome:**

- ❖ The subrecipient only pays for items or services not covered or partially covered by other health care coverage sources

FINANCIAL MANAGEMENT—

Allocations

- ▶ **Documents and questions to review**
 - ❖ Use tools on pages 12–13 (payroll)
 - ❖ Compare budgets and expenses for various funding sources
- ▶ **Interviews**
 - ❖ Accounting personnel, finance officer, accountant, payroll
- ▶ **Methodologies**
 - ❖ Unit Cost –agreeable rate
 - ❖ Cost based reimbursement—based on cost of service

FINANCIAL MANAGEMENT—

Allocations cont'd

► Outcomes

Expenses should appropriately be allocated directly or rational/justification such as:

- ❖ Payroll-----direct or time and effort
- ❖ Facility-----direct or square footage
- ❖ Occupancy-----direct or cost base, or fee for service
- ❖ Administration--direct or total dollar
- ❖ Communication--program/cost based

FINANCIAL MANAGEMENT—

Organization Risk

Documents

- ▶ Insurance policies or riders
- ▶ Federal Tort Claims Act (FTCA) deeming letter
- ▶ Risk reduction plan
- ▶ Disaster Plan
- ▶ Part B staff are aware of the incident reporting policy.
- ▶ Evidence of disaster and/or fire drills occurring at least annually

Interview

- Risk manager, compliance officer

Outcomes

- ▶ The sub-recipients has provisions for preventing accidents and accidental exposures

PROPERTY STANDARDS

(45 CFR 75 – Subpart D – Post Award)



- Equipment and supplies thresholds \$5,000



- Useful life



- Identify federal funding on property records by using the Federal award number



- Vested interest

COST PRINCIPLES

(45 CFR 75 Subpart E)

Cost Principles

- **Allowability**
- **Allocability**
- **Reasonableness**
- **Direct and indirect costs**

PROPERTY STANDARDS

Documents

- ▶ Depreciation ledger
- ▶ Property and procedures policies

Interviews

- Purchasing supervisor, CFO

Outcomes

- ▶ The sub-recipients has provisions and has implemented policies that Identify federal funding on property records by using the Federal award number and disposition policies recognize the federal government vested interest

COST PRINCIPLES

Effort Reporting–Compensation

(45 CFR § 75.430 (8) vii – ix)

- ▶ Support the distribution of the employee's salary or wages among specific activities or cost objectives
- ▶ Budget estimates (i.e., estimates determined before the services are performed) alone do not qualify as support for charges to Federal awards
- ▶ There must be a system that documents the estimates and produces reasonable approximations of the activity actually performed



COST PRINCIPLES

Compensation Allocation

Written policy that provides an after-the-fact process that:

- Documents the allocation of salaries and wages to a federal program
- Defines significant changes in the corresponding work activity
- Contains allocations that are reasonable over the long term
- That makes timely and necessary adjustments to the budget and payroll allocations to assure the amount charged to the federal award is accurate, allowable and properly allocated

FINANCIAL PROCEDURES

STANDARDS FOR FINANCIAL AND PROGRAM MANAGEMENT (§75.300)

- *The Federal awarding agency must manage and administer the Federal award (TO RECIPIENTS AND SUBRECIPIENTS AND SUBS OF SUBS) in a manner so as to ensure that Federal funding is expended and associated programs are implemented in full accordance with U.S. statutory and public policy requirements: Including, but not limited to, those protecting public welfare, the environment, and prohibiting discrimination.*
- Strong management team and an adequate financial structure that meets program and fiscal statutory requirements

FINANCIAL PROCEDURES

Procurement (45 CFR 75.326 – 75.335)

General Standards

- Documented policies required
- Documentation of fair & open competition
- Strict avoidance of conflicts of interest
- Documentation of cost and price analyses and vendor selection



THANKS

